<div align="center"><u>REMARKS</u></div>

<u>Drawings</u>

Applicant hereby submits amended Fig. 1 with a marked-up copy showing proposed

changes.

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<u>Rejection - 35 U.S.C. 103(a)</u>

The Examiner has rejected claims 1-11 under 35 U.S.C. 103(e) as being unpatentable

over the combination of Bhargava (5,471,248) and Jung (5,805,226). In reply, Applicant

submits that in order to show prima facie obviousness, it is required "that (1) there must be some

10   suggestion or motivation, either in the references themselves or in the knowledge generally

available to one of ordinary skill in the art, to modify the reference or to combine reference

teachings; (2) there must be a reasonable expectation of success; and (3) the prior art references

teach or suggest all the claim limitations" (MPEP 2143).

15   <u>Claims 1-4</u>

In rejecting claim 1, the examiner proposed it was obvious to combine the teaching of

Bhargava and Jung to make the present invention. Applicant respectfully disagrees. With

respect to the amended claim 1, Bhargava and Jung, either alone or in any combination do not

teach the following limitations:

20   (a) defining a plurality of tiles of data;

(b) defining a tile format table, separate from the data storage of said tiles, containing a

status entry for each of said plurality of tiles;

(c) compressing each of said tiles, wherein each tile is compressed if it is determined that

compression results in a smaller tile size;

(d) setting said status entry for each of said tiles in said tile format table, wherein said status entry indicates the memory size of each of said tiles after compression, with a full size indicating a non-compressed tile;

(e) storing said tiles in a memory.

5   Applicant submits that Bhargava at least does not teach limitations (b) and (d). The reasons are set forth as follow:

1. As amended, limitation (d) includes a new limitation on the tile format table, which states that the status entry in the tile format table indicates the memory size of each tile after compression, including whether the tile is compressed or not. In contrast, in Bhargava, FIG. 13A and 14

10   disclose a table listing only the tile location and data. The {dx, dy, dz} entries in the table do not have the memory size of compressed tiles and compression status of the tiles. Instead, Bhargava states in col. 9, lines 31-37:

"Each entry in the dictionary 78 comprises a dxdydx triplet, with the first two parameters set to values corresponding to tile dimensions and the third parameter to the single intensity value
15   assigned to all pixels in the defined tile."

This description holds for the alleged tile table listed for FIG. 13A and FIG. 14. The triplet dx, dy, dz is a way of encoding tile data, as indicated in FIG. 13A. There is no teaching of storing memory size of tiles after compression in Bhargava.

20

2. As amended, limitation (b) states "defining a tile format table, separate from the data storage of said tiles, containing a status entry for each of said plurality of tiles." The Examiner has cited FIG. 13A (col. 13, lines 30-45) and col. 10, lines 10-17 as reference for Bhargava teaching limitations (b). However, neither FIG. 13A nor col. 10 lines 10-17 refers to a "tile format table."
25   More specifically, FIG. 13A shows the transmission format used for transmitting an entire frame (col. 13, lines 31-34). As such the "HEADER" label in Fig. 13 refers to header information for

an entire frame, not an individual tile as alleged by the Examiner. Also, although Fig. 13A has a

label named "TILE DATA", it only indicates a section where the tile data is transmitted

sequentially. There is not a "tile format table" that is "separate from data storage" of the tiles.

In Bhargava, tile data and table listing is one and the same. Referring to FIG. 13A, col. 13, lines

5   39-41 of Bhargava state that "the data section of the structure is simply the set of tiles in the

order of their generation." The table in Bhargava offers no information regarding compression

status and compression sizes.

Furthermore, col. 10, lines 10-17 of Bhargava refer to the DATA FORMAT disclosed in

Appendix I. However, a closer look of Appendix I reveals that the DATA FORMAT disclosed

10   refers to an image data format with header information, not a tile data format as alleged (col. 17,

18). Finally, as this DATA FORMAT is used in step 52 of Fig. 5 (co. 10, lines 9-10), where tiles

have not yet been created according to the flow chart, it cannot be seen as a "tile format table."

In contrast, in the present invention, the tile format table is an entity "separate" from the

tile data, as outlined by the limitations of the amended claim 1. The tile format table has an entry

15   indicating the compression size of each tile stored in memory. The tile format table allows for

efficient read and write of tile data by the processor, because without the table the processor

would not know the status of tiles, which may or may not be compressed into various sizes. In

contrast, Bhargava does not teach such mechanism because it stores all tiles into a common data

format within a frame, nor does it suggest modification in its disclosure to make the present

20   invention. It must be noted that merely storing tile data in a format, as in Bhargava, does not

constitute having a tile format table as taught by the amended claim 1. Jung has no mention of

such limitation as well. Thus, even in combined, they do not teach all the limitations of the

present invention and do not suggest such modifications to be made.

For these reasons, Applicant submits that Bhargava and Jung, either alone or in any combination, do not suggest or teach all the limitations of claim 1. As such, a requirement for *prima facie* obviousness is not met. Thus Applicant requests the 103(a) rejection on claim 1 be withdrawn.

5   As claims 2-4 depend from claim 1, these claims are in a condition for allowance as well. Their rejection based upon 35 U.S.C. 103(a) has been overcome.

Claims 5-11

The Examiner rejected claim 5 with the same rationale set forth in the rejection of claim

10   1. As Applicant has overcome the rejection of claim 1, claim 5, presented here with the same amendments as claim 1, should be allowed by the same rationale. As claims 6-11 depend from claim 5, these claims are in a condition for allowance as well. Their rejection based upon 35 U.S.C. 103(a) has been overcome.

Applicant notes that, with respect to claim 9, it has been amended to incorporate the

15   allowable subject matter in claim 12 and should overcome the rejection as stated in the office action.

Objection to Claims 12-13

The Examiner has noted that claims 12 and 13 contain allowable subject matter are

20   objected to as being dependent upon a rejected base claims. Claim 12 has been canceled and its subject matter had been incorporated into claim 9. Since the rejection of claim 5 has been overcome, Applicant respectfully requests the objection to claim 13 be withdrawn.

CONCLUSION

The Examiner has rejected claims 1-11 and objected to claims 12-13. The Examiner has

5   also objected to Fig. 1. In reply, Applicant has amended the claims and replied to the 103(a)

rejection on claims 1-11. Claim 12 has been canceled and claims 14-15 have been added.

Applicant has also submitted an amended Fig. 1 to overcome the objection. Applicant asserts that

the present application is in a condition for allowance.

10   Respectfully submitted,

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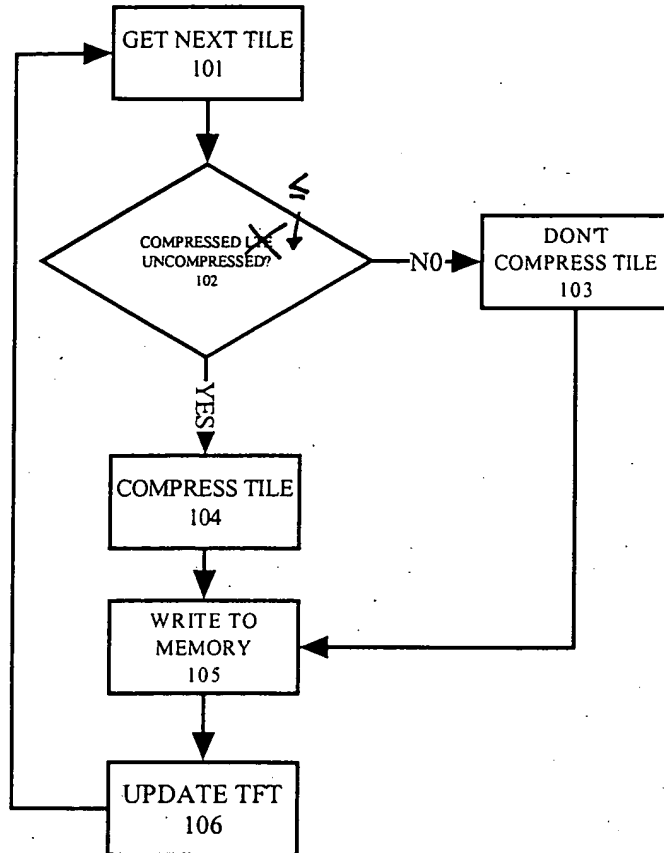   333 South Hope Street
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GET NEXT TILE
101

COMPRESSED UTE
UNCOMPRESSED?
102

NO → DON'T COMPRESS TILE
103

YES

COMPRESS TILE
104

WRITE TO MEMORY
105

UPDATE TFT
106

FIGURE 1